

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEA TRADE MARITIME CORPORATION and
GEORGE PETERS,

Plaintiffs,

v.

STELIOS COUTSODONTIS, FRANCESCA
ELENI COUTSODONTIS, GENERAL
MARITIME ENTERPRISES CORPORATION,
ATTIKA INTERNATIONAL NAVIGATION SA,
IASON SHIPPING LTD., PINTO SHIPPING
LTD. and KARTERIA SHIPPING LTD.,

Defendants.

Civil Action No.: 09 CIV 00488 (BSJ)

**DECLARATION OF PETER A.
HALPRIN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
MOTION TO DISMISS AMENDED
COMPLAINT AGAINST GENERAL
MARITIME ENTERPRISES
CORPORATION**

Peter A. Halprin, states as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and before the United States District Court for the Southern District of New York and an associate with the firm of Anderson Kill & Olick, P.C. ("AKO"), attorneys for Plaintiffs Sea Trade Maritime Corporation and George Peters in the above-referenced matter. The purpose of this Declaration is to place before the Court documents to which Plaintiffs refer in their accompanying Opposition to Motion to Dismiss Amended Complaint against General Maritime Enterprises Corporation.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Affidavit of Juval Aviv, dated December 19, 2006, regarding General Maritime.

3. Attached hereto as Exhibit 2 is a true and correct copy of a Document of Registration for Attika International Navigation, S.A.

4. Attached hereto as Exhibit 3 is a true and correct copy of a Purchase Agreement for the Athenoula, dated September 23, 2003.

5. Attached hereto as Exhibit 4 is a true and correct copy of a Sale Agreement for the Athenoula, dated August 28, 2007.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Affidavit of Juval Aviv, dated December 19, 2006, regarding letter and materials from the Panhellenic Union.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts contained in the foregoing are true and correct.

Dated: March 16, 2011
New York, New York

By: /s/ Peter A. Halprin
Peter A. Halprin, Esq.

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Sea Trade Maritime Corporation
and George Peters